

FRIEDMAN KAPLAN SEILER & ADELMAN LLP

BRUCE S. KAPLAN
EDWARD A. FRIEDMAN
GARY D. FRIEDMAN
BARRY A. ADELMAN
ERIC SEILER
ROBERT D. KAPLAN
ANDREW W. GOLDWATER
ROBERT J. LACK
GREGG S. LERNER
WILLIAM P. WEINTRAUB
RICHARD M. HOFFMAN
SCOTT M. BERMAN
GERALD ADLER
ERIC CORNGOLD
HAL NEIER
PHILIPPE ADLER
LANCE J. GOTKO
KATHERINE L. PRINGLE
MYRL S. ROSENBLATT
DANIEL B. RAPPORT
DAVID I. TANENBAUM
HALLIE B. LEVIN
ANNE E. BEAUMONT
MARY E. MULLIGAN
EMILY A. STUBBS
KENT K. ANKER
AMY C. BROWN
MALA AHUJA HARKER
RICARDO SOLANO JR.

1633 BROADWAY
NEW YORK, NY 10019-6708
TELEPHONE (212) 833-1100
FACSIMILE (212) 833-1250
WWW.FKLAW.COM

WRITER'S DIRECT DIAL
(212) 833-1193

WRITER'S DIRECT FAX
(212) 373-7993

E-MAIL
ESTUBBS@FKLAW.COM

HARVEY WEISSBARD
NORMAN ALPERT
ANDREW A. QUARTNER
ASAF REINDEL
COUNSEL

JESSICA A. MURZYN
JEFFREY C. FOURMAUX
LISA S. GETSON
JOHN N. ORSINI
JEFFREY R. WANG
CHAD M. LEICHT
JASON C. RUBINSTEIN
MICHAEL A. GORDON
ROBERT S. LANDY
RICKIE M. SONPAL
STEVEN E. FRANKEL
L. REID SKIBELL
EAMONN O'HAGAN
DANIEL R. GREENBERG
SHEELA V. PAI
JESSICA RICHMAN SMITH
KEVIN L. OBERDORFER
ELLEN LONDON
TIMOTHY M. HAGGERTY
JOHN C. LIN
ANDREW S. PAK
PHILIP A. WELLNER
BETTY W. GEE
AMY K. PENN
ANDREW LEVINE
GREGORY W. FOX
RAHUL AGARWAL
CHRISTOPHER M. COLORADO
KENNETH N. EBIE
KIZZY L. JARASHOW
BENJAMIN S. HOLZER

August 6, 2010

BY E-MAIL AND ECF

Hon. Robert E. Gerber
United States Bankruptcy Court
One Bowling Green
Room 627
New York, NY 10004

Re: *In re: Motors Liquidation Company, et. al* (No. 09-50026) /
Motion of the Official Committee of Unsecured Creditors
For an Order Pursuant to Bankruptcy Rule 2004 [Docket No. 6383]

Dear Judge Gerber:

This firm represents the Manville Personal Injury Settlement Trust (the "Manville Trust") and the Claims Resolution Management Corporation ("CRMC") in connection with the Objection that the Manville Trust and CRMC filed to the above-referenced Motion.¹ The Motion is scheduled for hearing on August 9, 2010, at 9:45 a.m.

The Manville Trust and CRMC's Objection indicated that Bates White, an advisor to the Official Committee of Unsecured Creditors (the "Committee"), had submitted an application for the licensing and distribution of certain Manville Trust data. *See* Objection, at ¶¶31-33. As described in the Objection, the Manville Trust's policies

¹ The Motion is Docket No. 6383. The Objection of the Manville Trust and CRMC is Docket No. 6484. Certain factual background relevant to the Objection is set forth in the Declaration of David T. Austern, which is Docket No. 6485.

Hon. Robert E. Gerber

- 2 -

August 6, 2010

require that it obtain the concurrence of certain constituencies² before approving any such application. At the time the Committee filed its Reply to the Objection on August 5, 2010, the Manville Trust had not received a response from either constituency.

We write to advise the Court that the Manville Trust and CRMC have learned that one of the constituencies does not consent to the licensing and distribution of Manville Trust data to Bates White. Accordingly, the Manville Trust and CRMC today advised Bates White that its application has been denied.

The Manville Trust and CRMC continue to object to the Motion.

Respectfully submitted,

/s/ Emily A. Stubbs

Emily A. Stubbs

cc: Interested Counsel (by e-mail)
All Parties Receiving Electronic Notice (via ECF)

² The constituencies are the Selected Counsel for the Beneficiaries and the Legal Representative of Future Claimants.